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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

MOOG INC.,

Plaintiff,

v

SKYRise, INC., ROBERT ALIN  
PILKINGTON, MISOOK KIM, and  
DOES NOS. 1-50,

Defendants.

SKYRise, INC.,

Counterclaimant,

v

MOOG INC.,

Counterclaim-Defendant.

CASE NO. 2:22-cv-09094-GW-MAR

**DEFENDANT-COUNTERCLAIMANT  
SKYRise, INC.'S APPLICATION  
FOR LEAVE TO LODGE UNDER  
SEAL CERTAIN PORTIONS OF  
JOINT STIPULATION RE:  
DEFENDANTS' MOTION TO  
ENFORCE ORDER COMPELLING  
TRADE SECRET IDENTIFICATION  
AND ACCOMPANYING  
DECLARATIONS AND EXHIBITS**

Hon. Margo A. Rocconi

**TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

PLEASE TAKE NOTICE that, pursuant to Local Rule 79-5.2.2(b), Defendant and Counterclaimant Skyryse, Inc. (“Skyryse”) hereby applies for an order permitting the following documents filed in connection with the parties’ Joint Stipulation Re: Defendants’ Motion to Enforce Order Compelling Trade Secret Identification (“Joint Stipulation”) to be lodged under seal with the Court.

Document	Designating Party	Text to be Filed/Lodged under Seal
Joint Stipulation Re: Defendants’ Motion to Enforce Order Compelling Trade Secret Identification	Moog	Highlighted portions in the unredacted version at pages: 14:24-25, 14:28-15:6, 15:9, 15:17-19, 16:21, 29:4, 29:22-25
Exhibits to Declaration of K. Storey	Moog	Exhibits D and E in their entirety
Exhibits to Declaration of K. Naqvi	Moog	Exhibit 1 in its entirety

As the Filing Party, Skyryse has provisionally lodged under seal certain portions of the Joint Stipulation and accompanying documents that Plaintiff and Counterclaim-Defendant Moog, Inc. has designated as Protected Material under the Protective Order entered in this action, dated May 6, 2022 (Dkt. 89), or that Moog has otherwise requested to be sealed. Accordingly, pursuant to paragraph 12.1 of the Protective Order, Skyryse seeks to provisionally lodge these materials under seal until such time as Moog withdraws its confidentiality designations or the Court rules on a forthcoming application from Moog to justify that these documents, or portions of thereof, remain under seal. Skyryse reserves all rights under the Protective Order to challenge Moog’s designations of the identified materials as Protected Material.

1 This application is further based upon the accompanying Declaration of  
 2 Rachel S. Horn in Support of this Application; any pleadings, files, and records in  
 3 this action; and any further evidence or argument as this Court may consider.

4 Between April 27, 2023 and May 8, 2023, counsel for Skyrise conferred via  
 5 email with counsel for Moog regarding the Joint Stipulation. On May 8, 2023,  
 6 counsel for Moog approved the Joint Stipulation and accompanying documents for  
 7 filing, but requested to redact certain portions of the Joint Stipulation from the public  
 8 docket and file them under seal. Counsel for Moog stated that Moog's proposed  
 9 redactions involved references to sensitive government programs and substantive  
 10 quotations from Moog's trade secret identification. Counsel for Skyrise followed up  
 11 via email and confirmed that the identified materials would be provisionally lodged  
 12 under seal under Local Rule 79-5.2.2(b) based on Moog's request, subject to Moog's  
 13 declaration establishing that all or part of the designated material is sealable.

14  
 15 Dated: May 9, 2023

Respectfully submitted,

16 LATHAM & WATKINS LLP

17 By: /s/ Gabriel S. Gross

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